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April 9, 2001

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communication Commission
445 Twelfth Street, Room TW-A325
Washington, DC 20554

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Re: Opposition to Petitions for Reconsideration – CC Docket No. 92-105

Dear Ms. Salas:

The Minnesota Department of Transportation hereby expresses our opposition to the petitions for reconsideration in the proceedings entitled “The Use of N11 Codes and Other Abbreviated Dialing Arrangements” – CC Docket No. 92-105.

When asked, travelers in Minnesota nearly always confirm that road condition information is one of the most important traveler needs throughout Minnesota. More and more they are requesting and even demanding access to information on rapidly changing road conditions due to winter weather, flooding, severe thunderstorms, and traffic incidents. They also want to know about delays caused by roadwork. In order to meet this demand, Minnesota has created centralized toll-free numbers to provide easy traveler access to road conditions. Minnesota has also been an early provider of abbreviated numbers for cellular access (e.g., #211 in the Twin Cities and #SAFE in Greater Minnesota). Minnesota Department of Transportation (Mn/DOT) is committed to be a trusted source of information upon which travelers can rely.

Mn/DOT has adopted a plan for implementation of 511 for statewide access to traveler information. This plan will implement 511 in two phases. Phase 1, or wireless access to road conditions, is in progress and most wireless providers have voluntarily programmed their systems to forward 511 calls to Mn/DOT’s central toll-free number. It is anticipated most of the landline providers will do the same once they are given the opportunity. Mn/DOT is planning to cooperate with wireless providers to do a significant marking campaign before next winter.

Mn/DOT’s plan for Phase 2 of 511 implementation is intended to provide considerable stakeholder involvement and provide opportunity for optimization of the private sector role in order to maximize the safety and efficiency benefits to travelers.

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Mn/DOT wrote in support of the original US DOT N11 petition. Mn/DOT's full support of a national 511 program. Mn/DOT Commissioner Elwyn Tinklenberg serves as Chair of the AASHTO committee developing the nationwide 511 program. Mn/DOT individuals are very active on the policy and working groups.

Following are responses to the specific issues in the petitions for reconsideration:

Issue: The FCC failed to adequately explain the technical requirements for wireless carriers to route 511 calls, especially where a cell tower serves multiple political jurisdictions.

Response: In Minnesota, the 511 implementation will be centralized and connectivity to adjacent states will be provided within the State's technology. Minnesota, North Dakota and South Dakota share a common information service provider and all three states' road conditions are in the same database. Travelers who access the wrong state will be able to switch to any adjacent state through menu options. While databases are different in Iowa and Wisconsin, the telephony can be programmed to forward calls when either state is selected. We hope to work out a cooperative agreement with both states.

Issue: The order does not explain what priority should be given to multiple requests for 511 in a given area.

Response: In Minnesota, the Minnesota DOT is leading the 511 effort. All requests for 511 service will be coordinated through Mn/DOT's 511 Project Manager. There will not be multiple requests, unless the telecommunications service provider is unable or fails to respond to the first request from Mn/DOT.

Issue: The order, as it applies to wireless carriers, will have a detrimental effect on wireless competition. Because the 511 code is reserved for government entities, a government monopoly is created that prevent wireless carriers from competing to provide traveler information services. Consequently, compliance with the order should be voluntary for wireless carriers.

Response: Mn/DOT is planning to give the private sector an opportunity to play a significant role in long-term 511 implementation. Mn/DOT will explore options for private sector involvement which optimize services provided to travelers and minimize long term public operational and maintenance support. We believe a competitive private sector will be able to provide 511 through broader value-added services in a way that will limit cost to consumers and optimize the opportunity to provide information for multiple stakeholders from commuters to vacationers to commercial travelers.

Issue: The U.S. Department of Transportation, who petitioned the FCC for the 511 assignment, failed to provide sufficient evidence, especially regarding the resulting benefits, to justify the FCC's action.

Response: Mn/DOT and neighboring states have implemented toll-free and abbreviated calling systems for statewide road conditions. As familiarity with these numbers increases, so does call volume. We believe that 511 will result in a startling increase in call volume once it is widely available, widely publicized and provides access to quality and timely information. Mn/DOT has conducted numerous studies of traveler needs for various types of travel-related information. Information is highly desired by travelers. Easy access is also highly desired. The benefits, while not in quantifiable terms, is expected to result in safer and more efficient travel for both individual travelers and commercial travels.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Marthand Nookala', with a long horizontal stroke extending to the right.

Marthand Nookala
Assistant Director
Program Support Group